

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
09 MAY 11 PM 4:11

SHOEMONEY MEDIA GROUP, INC.,

Plaintiff,

vs.

KEYEN FARRELL and JOHN J. FARRELL,

Defendants.

Case No. 8:09-cv-01311-OF THE CLERK

**INDEX OF EVIDENCE IN SUPPORT OF PLAINTIFF'S REPLY BRIEF IN SUPPORT
OF MOTION TO EXTEND DEADLINE FOR RESPONDING TO DEFENDANTS'
MOTION TO DISMISS, AND MOTION FOR LEAVE TO CONDUCT JURISDICTIONAL
DISCOVERY**

COMES NOW the Plaintiff, SHOEMONEY MEDIA GROUP, INC., and respectfully submits the following evidence in support of its Motion to Extend Deadline for Responding to Defendants' Motion to Dismiss, and Motion for Leave to Conduct Jurisdictional Discovery:

Exhibit 1: Declaration of Jeremy Schoemaker

- A: Screen shots showing some of Defendants' infringements of Plaintiff's trademark
- B: Contact screen from www.myincentivewebsite.com
- C: Video showing the Defendants targeted their advertisements at Nebraska residents
- D: Defendants' tax documents displayed on www.myincentivewebsite.com
- E: Article from "Colby Magazine" regarding Keyen Farrell

Exhibit 2: Declaration of Aaron Baker

- A: Screen shots provided by Keyen Farrell showing selected pages of Defendants' AdWords account

Exhibit 3: Declaration of Patrick S. Cooper

- A: E-mail received from Keyen Farrell on April 1, 2009 (with attachments)

Dated this 11th day of May, 2009.

Respectfully submitted,

SHOEMONEY MEDIA GROUP, INC.,
Plaintiff

By: Patrick S Cooper
Troy F. Meyerson, # 21756
Patrick S. Cooper, #22399
FRASER STRYKER PC LLO
500 Energy Plaza
409 South 17th Street
Omaha, NE 68102-2663
(402) 341-6000

CERTIFICATE OF SERVICE

I certify that on this 11th day of May, 2009, I filed the foregoing by hand-delivery to the U.S. District Court Clerk, and I served a copy by regular U.S. mail upon the following:

J. Scott Paul
Michaela A. Smith
McGrath, North, Mullin & Kratz
Suite 3700, First National Tower
1601 Dodge Street
Omaha, NE 68102

Patrick S Cooper

W509570.01

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

SHOEMONEY MEDIA GROUP, INC.,)	Case No. 8:09cv131
)	
Plaintiff,)	
)	
vs.)	DECLARATION OF
)	JEREMY SCHOEMAKER
KEYEN FARRELL and JOHN J. FARRELL,)	
)	
Defendants.)	

The undersigned, JEREMY SCHOEMAKER, states and declares as follows:

1. I am the founder of Plaintiff ShoeMoney Media Group, Inc. I submit this Declaration in support of Plaintiff's Motion to Extend Deadline for Responding to Defendants' Motion to Dismiss, and Motion for Leave to Conduct Jurisdictional Discovery.
2. I have personal knowledge of and am competent to testify about the facts stated herein and the documents attached hereto.
3. I am an entrepreneur, and I focus my efforts in a variety of internet-based business endeavors. I am a frequent speaker at search engine marketing conferences and I founded the Elite Retreat conference, which provides lectures and seminars on how to run profitable internet businesses.
4. I founded ShoeMoney Media Group, Inc. in 2005. ShoeMoney Media Group's primary web sites are located at www.shoemoney.com and www.shoemoneymedia.com. Each web site contains prominent notices that ShoeMoney Media Group and I are located in Nebraska.
5. ShoeMoney Media Group conducts the vast majority of its business over

the internet and receives an average of approximately 30,000 unique visitors to its primary web sites each day. Many of the visitors locate those web sites by searching for "ShoeMoney" in search engines such as Google.

6. ShoeMoney Media Group provides advice and tools to assist third parties in making money on the internet and running profitable internet businesses.

7. ShoeMoney Media Group and I, and the web site www.shoemoney.com, have been featured on or appeared in The Wall Street Journal, ABC News 20/20, The New York Times, The Washington Post, The Christian Science Monitor, The New York Post, Forbes.com, Entrepreneur magazine, The Boston Globe, Tech Crunch, cnet/News.com, Google's Biggest Money Makers, Slate magazine, Skyradionet, and other publications. One commentator recently named me the "tenth most powerful and influential man in social media," and the blog at www.shoemoney.com has made Technorati.com's "Top 100 most read blogs on the internet" for the past two years.

8. In 2007, I registered the Shoemoney trademark on behalf of ShoeMoney Media Group. The reason I chose to register the mark was because third parties were using the mark, without my permission, in the text of their ads placed through the Google Adwords program. Google prohibits persons from using registered trademarks in the text of ads purchased through the Google Adwords program, but it requires trademark owners to notify Google of the existence of the trademark before it will prevent others from using the trademarked term.

9. In the fall of 2007, I notified Google that ShoeMoney Media Group had registered the "Shoemoney" trademark. Google acknowledged my trademark registration on November 1, 2007 and, pursuant to Google's policy, Google then prevented third parties

from using the "Shoemoney" trademark in the text of their ads placed through the Google Adwords program. After notifying Google that "Shoemoney" was a registered mark, third parties were no longer able to use "Shoemoney" in the text of their ads placed through the Google Adwords program. Persons who attempt to create an ad using the term "Shoemoney" in the text of the ad are now notified that the proposed ad is rejected because it contains a trademarked term.

10. The Defendants violated Google policy by using the "Shoemoney" mark in the text of various ads they placed through Google Adwords for their web site, www.myincentivewebsite.com. A true and correct copy some of the Defendants' ads for their web site, using the "Shoemoney" mark, are attached hereto as Exhibit "A."

11. After learning that someone was using the "Shoemoney" mark to promote their own web site at www.myincentivewebsite.com, I sought to locate the name and contact information for the person operating that web site. My research indicated that the web site was registered using a privacy masking system, which prevents the general public from learning the identity of the persons who own the web site.

12. The registration information for the web site listed e-mail addresses for the technical and administrative contacts for the site. On February 24 2009, I sent an e-mail to those e-mail addresses and I advised the recipients that "Shoemoney" was a registered trademark and I demanded that the recipients immediately cease and desist all further use of the mark in advertising their competing web site, www.myincentivewebsite.com. My signature block in that e-mail included my Nebraska mailing address.

13. After my February 24, 2009 e-mail was ignored, I visited the

www.myincentivewebsite.com web site and navigated to a contact screen that allowed me to send a message to the owner/operator of the web site. A true and correct copy of the contact screen from www.myincentivewebsite.com is attached hereto as Exhibit "B." Using the contact form on the Defendants' web site, I sent another message to the owner and/or operator of the web site advising that "Shoemoney" was a registered trademark and demanding that they immediately cease and desist further use of the trademark. Again, I included my Nebraska address in my communication. If I am authorized to serve a Subpoena upon Lunar Pages, the web host for www.myincentivewebsite.com, I will ask for the raw access logs (apache access_log). Using those logs, I will attempt to determine whether the Defendants viewed my message [including the date and time when the message was viewed and the IP address from which the message was viewed]. This information may allow me to confirm or refute the Defendants' questionable claim that they learned of the "Shoemoney" trademark for the first time on March 31, 2009.

14. While I was investigating the use of the "Shoemoney" trademark on the www.myincentivewebsite.com web site, I determined that the domain registrar for the web site was a company called namezero. Keyen Farrell had paid an additional fee to namezero so that he could register the account with a privacy setting that prohibits the general public from learning his identity and contact information. I do not know why he chose to hide his identity and contact information from the general public when registering the web site. I subsequently attempted to obtain his identity and contact information from the Lunar Pages, the web host for www.myincentivewebsite.com, but Lunar Pages would not release that information without a Subpoena.

15. In March, 2009, my legal counsel filed a miscellaneous action in Douglas

County District Court and requested that the Court authorize the issuance of a Subpoena upon Lunar Pages. The Court authorized the issuance of the Subpoena and ordered Lunar Pages to respond to the Subpoena. Lunar Pages responded to the Subpoena by informing us that Keyen Farrell was the owner/operator of the www.myincentivewebsite.com web site.

16. On April 1, 2009, Keyen Farrell responded to a letter sent by my legal counsel. According to Keyen Farrell, he began using the "Shoemoney" keywords on January 30, 2009. Keyen Farrell attached to his response four screen shots from his Google Adwords account. The screen shots demonstrate that the Farrell Defendants were specifically targeting their advertisements to persons who were conducting internet searches for the following terms: shoemoney, www.shoemoney, www.shoemoney.com, shoemoney.com, wwwshoemoney, and shoemoneycom.

17. The screen shots provided by Keyen Farrell show four separate ad groups which had been set to differing geographical and matching options. Each screen shot shows the "default" ad that would appear to Nebraska residents, and persons in other targeted geographical areas, for that particular ad group. The screen shots provided by Keyen Farrell do not show the other ad variations used in those ad groups to target Nebraska residents with the "Shoemoney" trademark. If we were allowed to conduct jurisdictional discovery, I would want to request the logs for this AdWord account from Google so that I could analyze whether there are additional advertisements using the "Shoemoney" trademark that target Nebraska residents.

18. The screen shots provided by Keyen Farrell also show that he established 1,319 ad groups, all of which appear to have been set up to market to Nebraska residents.

19. I reviewed the Affidavits of Keyen Farrell and John Farrell that were filed in support of their Motion to Dismiss. In those Affidavits, the Farrells state that “[i]n promoting the website www.myincentivewebsite.com, [they] have not targeted Nebraska residents through mailings, phone calls, or otherwise.” However, the screen shots provided by Keyen Farrell in his April 1, 2009 e-mail demonstrate that the Farrells specifically chose to market their ads and their web site to Nebraska residents.

20. I am familiar with the Google Adwords program, and I have operated my own account through Google Adwords for several years. When a person establishes a new AdWords ad, Google specifically asks the person what geographical area the advertiser wants the ad to appear in. For example, a person may choose for his or her ad to appear everywhere in the United States, or only in select states, countries, or metropolitan areas. When a person selects the United States as the location for an ad to be displayed, Google then provides the advertiser with a list of each state within the United States and it asks the advertiser which states or geographical areas, if any, the advertiser wants to exclude from its advertising market. Thus, the advertiser is forced to make a conscious decision regarding which states it wishes to do business in. Attached hereto as Exhibit “C” is a CD containing a video I made demonstrating the process of selecting the geographical area where one’s ad is targeted to appear. The graphics and statements in the attached video are true and correct. Because the video cannot be filed electronically, I understand that Exhibit C to this Affidavit will be manually filed with the Court and hand-delivered to the Defendants’ attorneys.

21. The Adwords access records/logs for the Farrells’ Adwords account will

likely show whether the Farrells selected the "Shoemoney" mark, and the variations of that mark, or whether Google suggested those terms to them. Those records could be obtained from Google.

22. Google also has records of all of the IP addresses from which the Farrells' Adwords account was accessed. Those IP addresses can be cross-checked against logs of visitors to www.shoemoney.com to determine whether and when the Farrells visited www.shoemoney.com or www.shoemoneymedia.com, thus indicating that they were well aware of the existence of me, ShoeMoney Media Group, and the "Shoemoney" trademark (contrary to their assertions that they had never heard of ShoeMoney Media Group or the "Shoemoney" trademark prior to March 31, 2009). Likewise, if the Defendants were required to provide me with a list of IP addresses from which they have accessed the internet in the past several years, those IP addresses may also be compared to logs from the ShoeMoney Media Group web sites to determine if the Defendants have visited those web sites (and thus were well aware of the existence of me, ShoeMoney Media Group, and the "Shoemoney" trademark).

23. Keyen and John Farrell state in their Affidavits that they have generated revenue of only \$61 from sales to Nebraska residents, which they claim represents "one half of one percent of the total revenue generated by www.myincentivewebsite.com." However, a review of the www.myincentivewebsite.com web site indicates that customers are charged \$17 for each purchase on that web site. Three sales at \$17/sale would not equal \$61, and thus it is unclear how the Defendants calculated the amount of revenue generated from Nebraska residents on this particular web site.

24. On the www.myincentivewebsite.com web site, the Farrells represent that

they have "operated Incentive web sites for over five years." The Farrells have posted tax forms from 2004 and 2005 on their web site indicating that they earned over \$313,000 in 2004 and \$289,000 in 2005 using their incentive web site(s). A true and correct copy of those tax documents from the Defendants' web site is attached hereto as Exhibit "D." The Farrells have not presented any evidence of how many transactions they entered into through their other web sites with Nebraska residents or the amount of revenue generated through those transactions with Nebraska residents. Discovery regarding other incentive web sites used by the Defendants could demonstrate substantial additional contacts between the Farrells and the State of Nebraska. Defendants have not presented any of that evidence to the Court in their Affidavits, and their other contacts with Nebraska residents should be explored to determine what information about those contacts was selectively omitted from the Defendants' Affidavits.

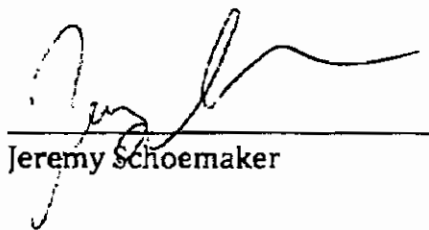
25. Defendant Keyen Farrell attended Colby College. In the Spring of 2005, Colby College's "Colby Magazine" printed an article which featured Keyen Farrell's success making money on the internet. A true and correct copy of that article is attached hereto as Exhibit "E." In that article, Keyen Farrell boasts that his internet business has generated enough revenue to put him "in the top one percent in income in the United States." Keyen Farrell explains in the article that he bids on terms such as "loan quotes" so that people searching the internet for "loan quotes" will be directed to his site, which in turn offers products and services such as loan quotes. Keyen Farrell states in the article that his web site at that time was generating approximately 3,000 sales/transactions per month. Keyen Farrell also states that he earned enough money through his internet business to purchase a second sailboat and he paid cash for a BMW X-5. The Farrells have not presented any

evidence of the amount of contacts they have had with residents of Nebraska through those web sites, or the volume of revenue generated from those web sites, despite the fact that Keyen Farrell's statements and the tax forms on the web site indicate that those contacts and revenues were likely substantial.

26. In my opinion, the www.myincentivewebsite.com web site operated by the Farrells is inferior to the methods advocated by ShoeMoney Media Group about how to make money on the internet and otherwise run profitable internet businesses. When people are led to believe that web sites such as www.myincentivewebsite.com are affiliated with, or sponsored by, ShoeMoney Media Group, it causes substantial harm to the brand and reputation of ShoeMoney Media Group, which I have worked diligently over the past several years to develop and protect. If I allowed persons to use the "Shoemoney" trademark for business schemes such as the one run by the Farrells, the "Shoemoney" brand would have substantially diminished value because the general public would be unable to differentiate between my true services and those offered by persons such as the Farrells.

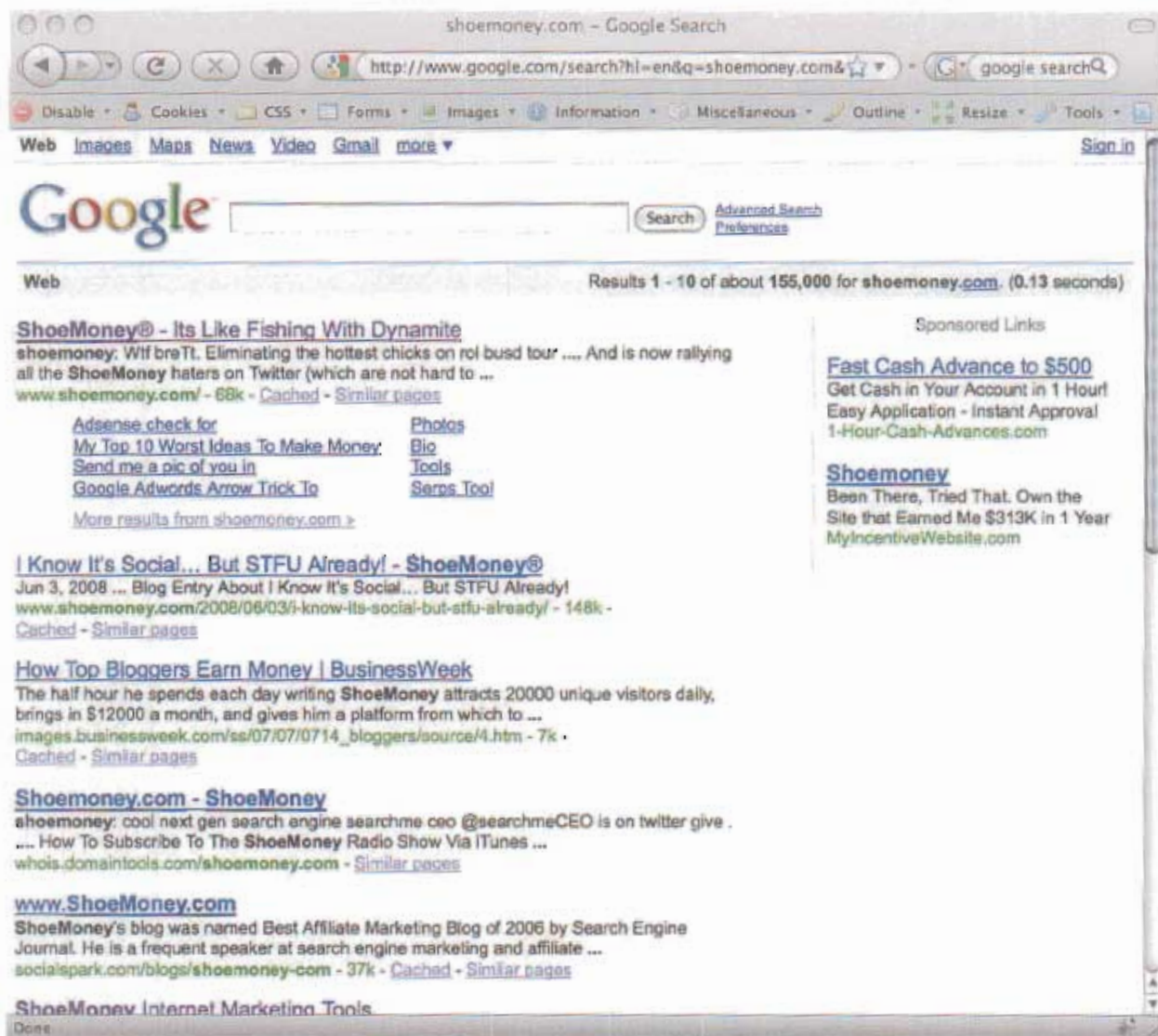
27. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 11th day of May, 2009.



Jeremy Schoemaker

W509651.02



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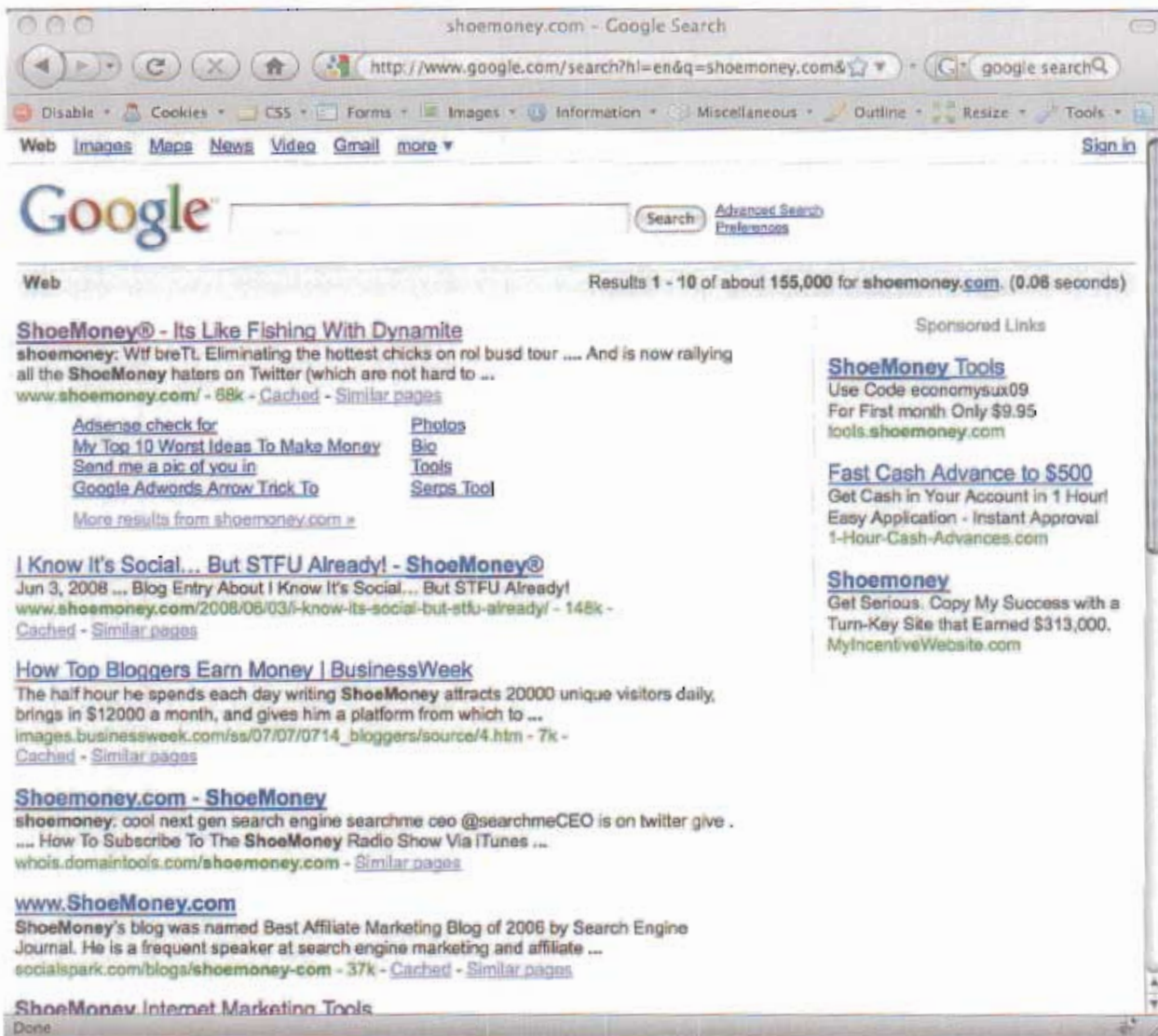
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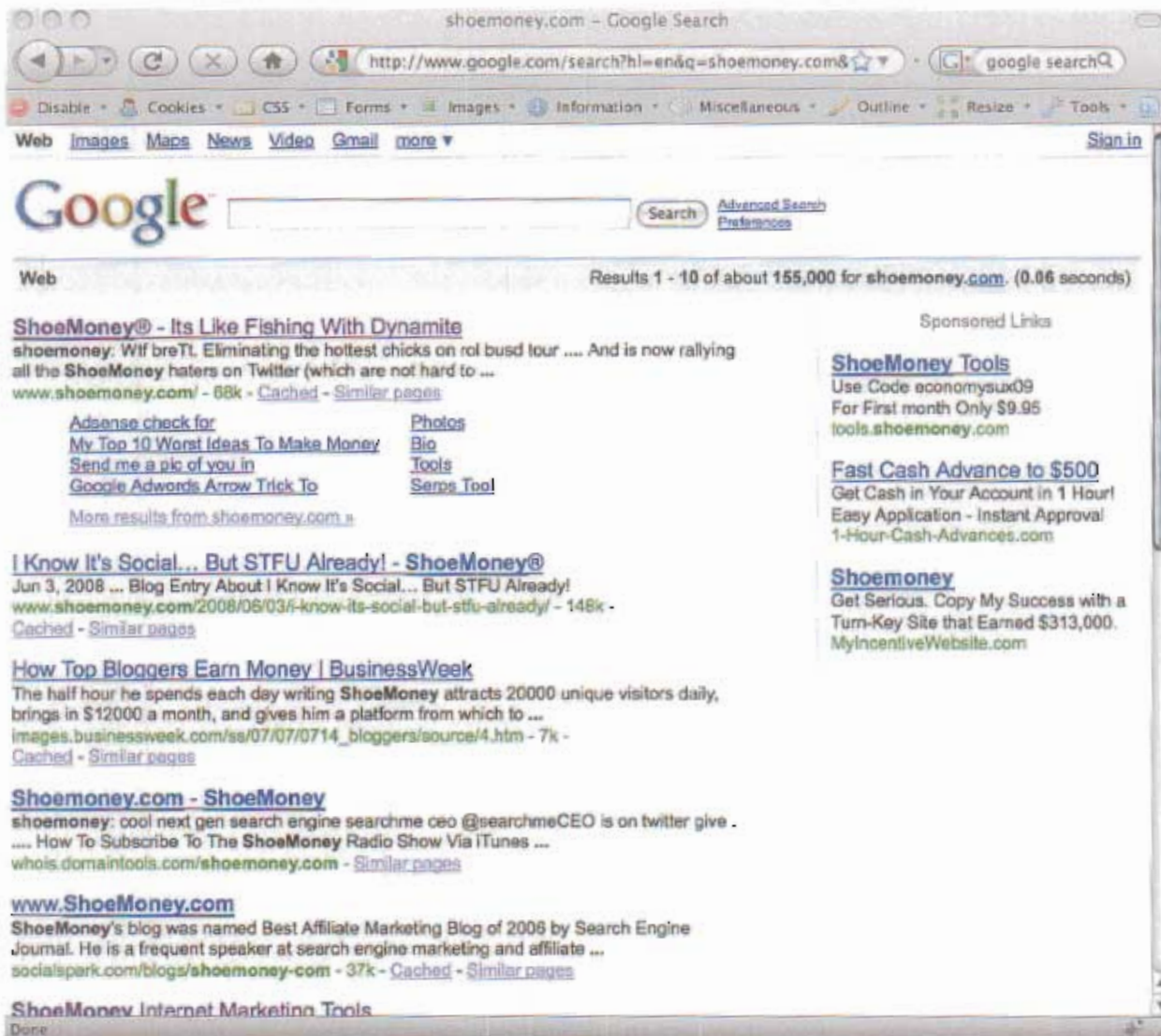
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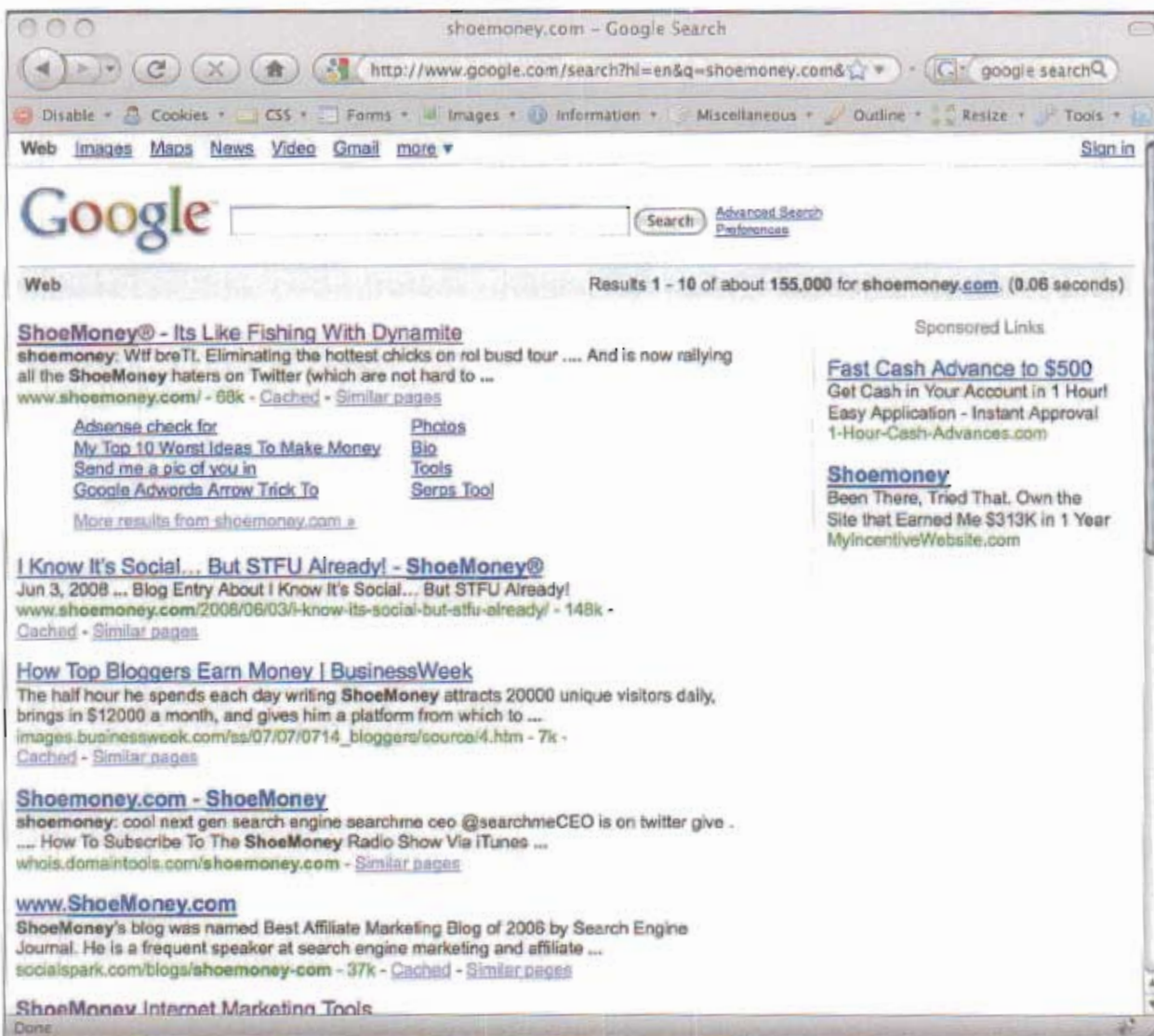
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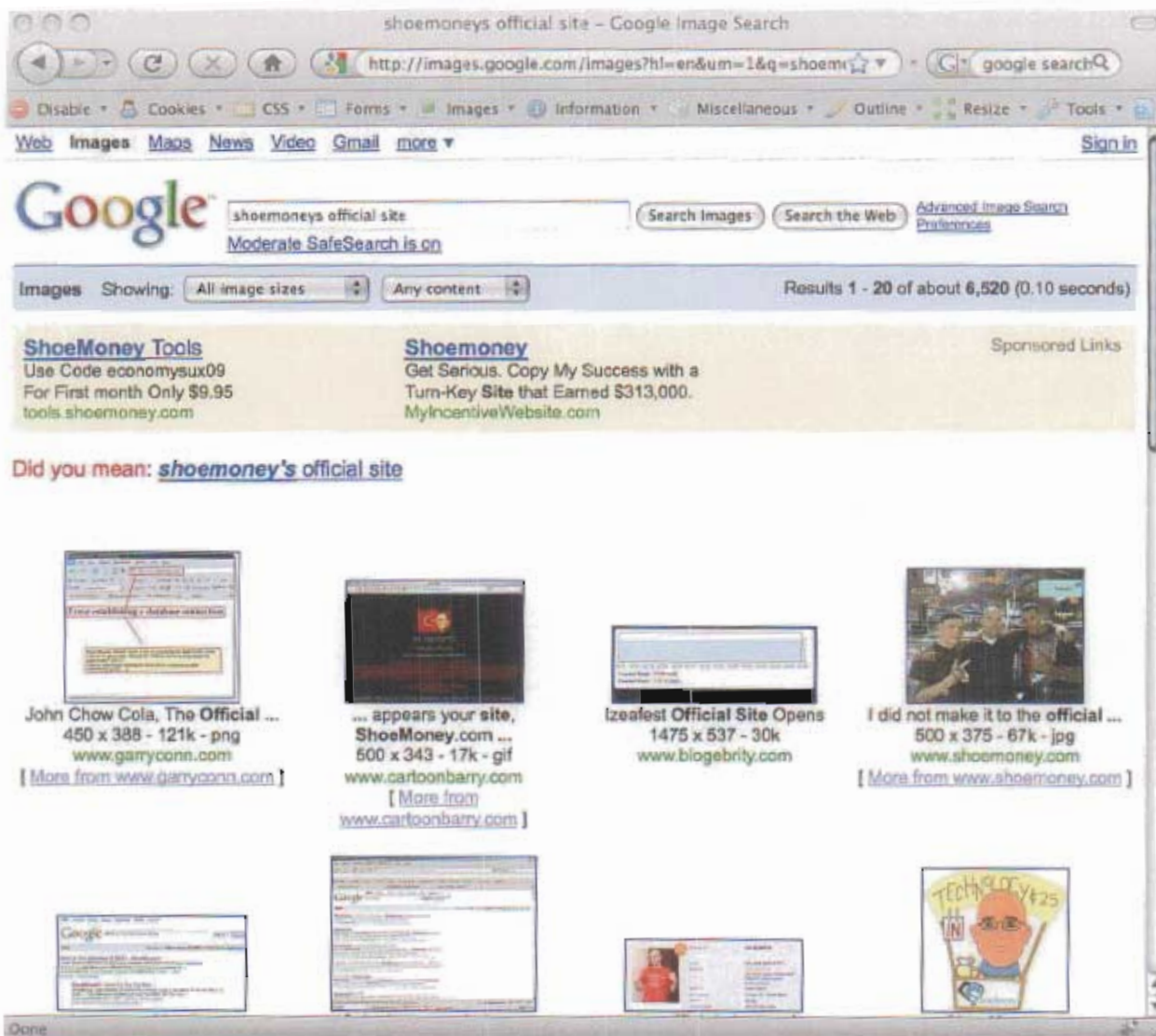
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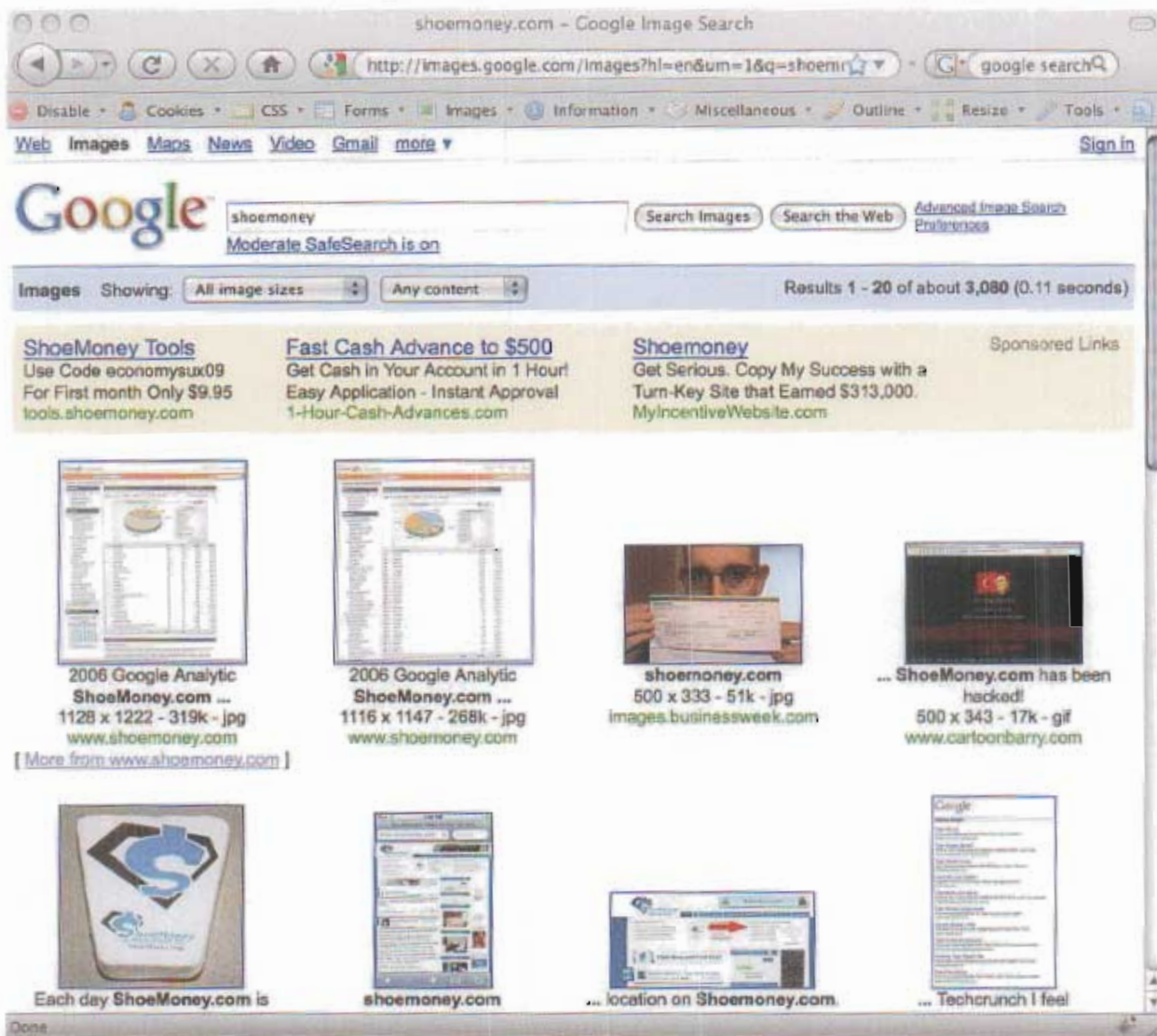
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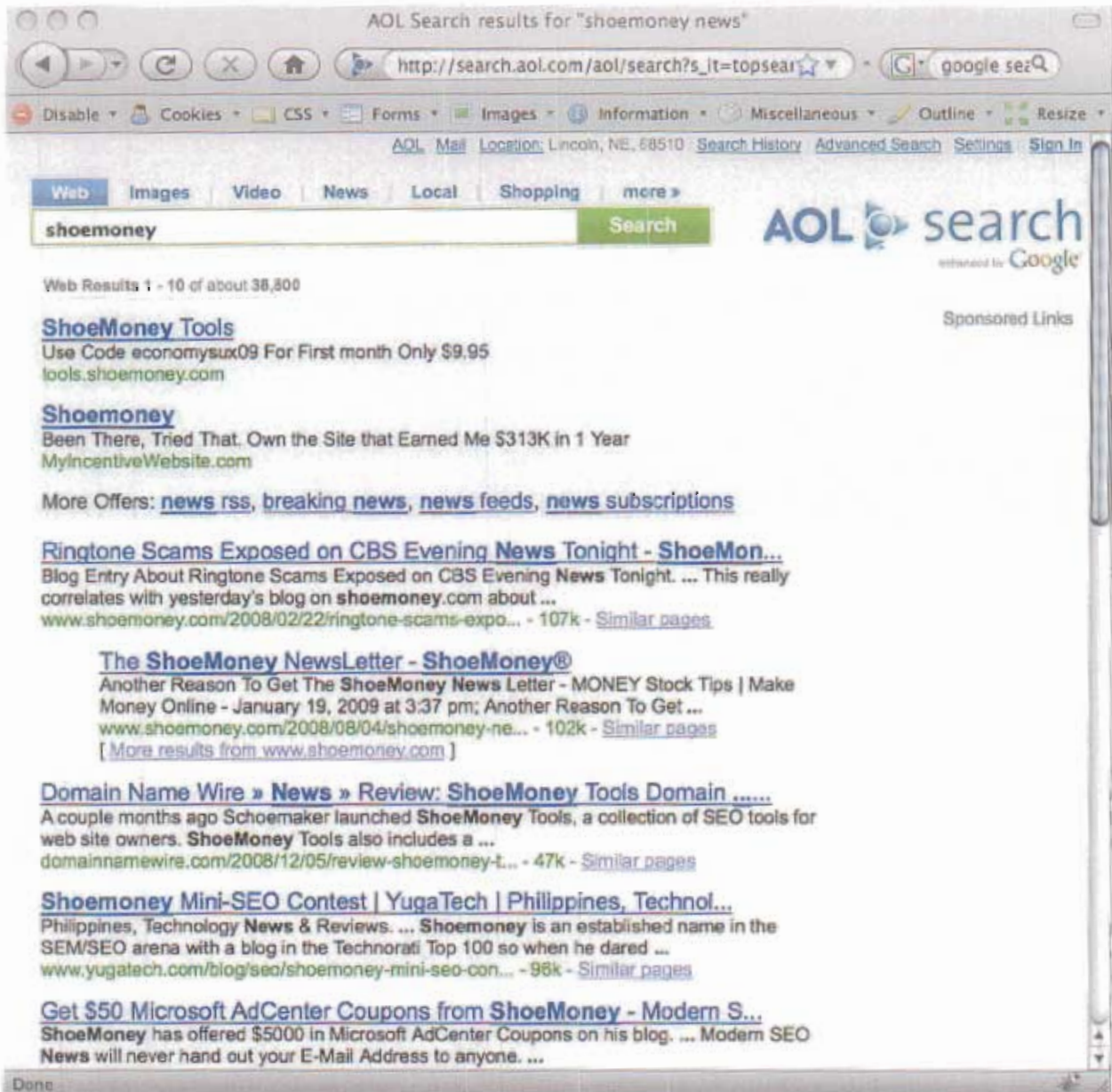
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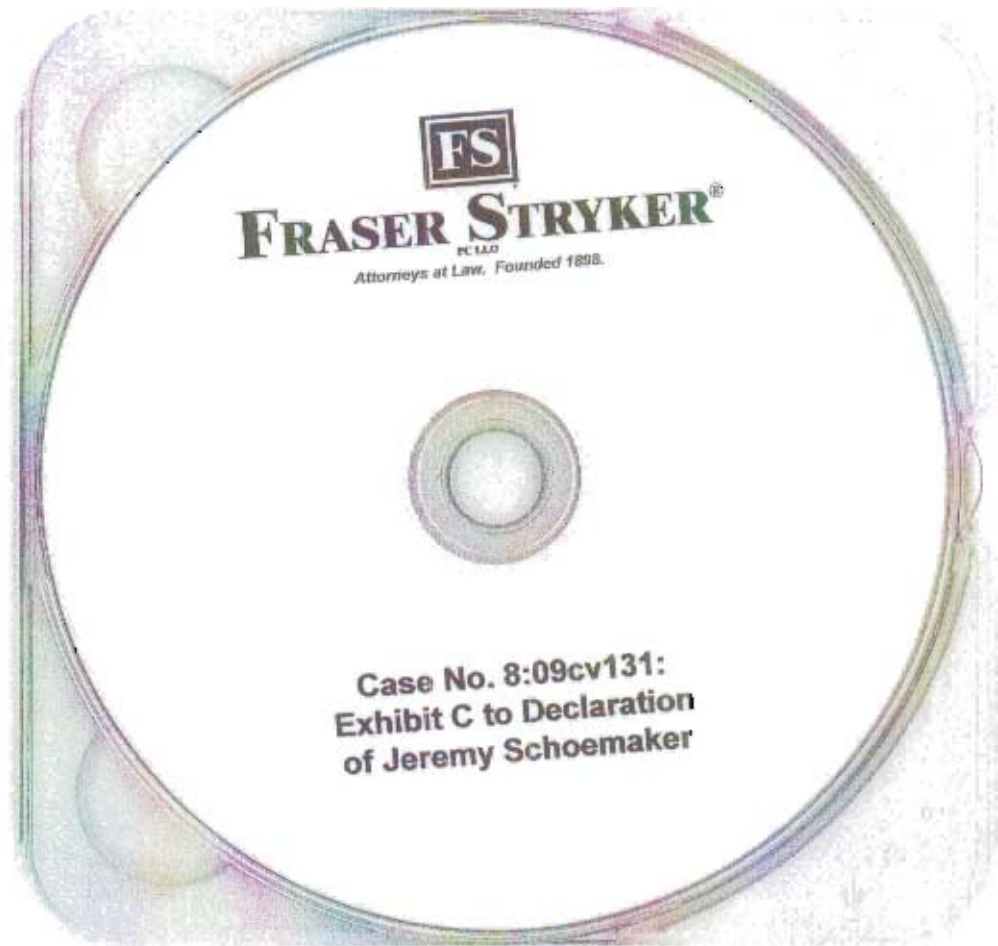
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RECIPIENT'S Name and Address [REDACTED]		RECIPIENT'S Social Security Number [REDACTED]	
Account Number (Optional) 1023769		Form 1099-MISC	
1. Other income [REDACTED]		2. Royalties [REDACTED]	
3. Other income [REDACTED]		4. Self-employment income [REDACTED]	
5. Fishing boat proceeds [REDACTED]		6. Med & health care procs [REDACTED]	
7. Nonemployee Compensation \$ 313032.85		8. Gifts in lieu of Div or Int [REDACTED]	
9. Other income (Other than 1-8) [REDACTED]		10. Crop insurance proceeds [REDACTED]	
11. Excess Golden Par Pmts [REDACTED]		12. Gross paid to an attorney [REDACTED]	
13. State tax withheld [REDACTED]		14. State Payer's state no. [REDACTED]	
15. Other [REDACTED]		16. State income [REDACTED]	

Department of the Treasury • Internal Revenue Service

**Miscellaneous
Income**

**Copy 2
To be filed
with
recipient's
state income
tax return,
when
required.**

PAYER'S NAME, STREET ADDRESS Commission Junction Inc. 30699 Russell Ranch Rd Ste 250 Westlake Village, CA 91362 (818) 575-4500 x4607		RECIPIENT'S NAME, STREET ADDRESS [REDACTED]		2005 Form 1099-MISC Miscellaneous Income Copy 2 To be filed with recipient's state income tax return, when required.	
PAYER'S Federal identification number 41-1922033	RECIPIENT'S identification number [REDACTED]	1 Other income \$	2 Rents \$	3 Dividends \$	4 Royalties \$
5 Nonemployee compensation \$ 289,147.79		6 Medical and health care payments \$			
7 Substantiated employee expenses \$		8 Insurance proceeds \$			
9 State income tax paid \$		10 State income tax refund \$			
11 State income tax paid \$		12 State income tax refund \$			
13 State income tax paid \$		14 State income tax refund \$			
15 State income tax paid \$		16 State income tax refund \$			
17 State income tax paid \$		18 State income tax refund \$			
19 State income tax paid \$		20 State income tax refund \$			
21 State income tax paid \$		22 State income tax refund \$			
23 State income tax paid \$		24 State income tax refund \$			
25 State income tax paid \$		26 State income tax refund \$			
27 State income tax paid \$		28 State income tax refund \$			
29 State income tax paid \$		30 State income tax refund \$			
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33 State income tax paid \$		34 State income tax refund \$			
35 State income tax paid \$		36 State income tax refund \$			
37 State income tax paid \$		38 State income tax refund \$			
39 State income tax paid \$		40 State income tax refund \$			
41 State income tax paid \$		42 State income tax refund \$			
43 State income tax paid \$		44 State income tax refund \$			
45 State income tax paid \$		46 State income tax refund \$			
47 State income tax paid \$		48 State income tax refund \$			
49 State income tax paid \$		50 State income tax refund \$			
51 State income tax paid \$		52 State income tax refund \$			
53 State income tax paid \$		54 State income tax refund \$			
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57 State income tax paid \$		58 State income tax refund \$			
59 State income tax paid \$		60 State income tax refund \$			
61 State income tax paid \$		62 State income tax refund \$			
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67 State income tax paid \$		68 State income tax refund \$			
69 State income tax paid \$		70 State income tax refund \$			
71 State income tax paid \$		72 State income tax refund \$			
73 State income tax paid \$		74 State income tax refund \$			
75 State income tax paid \$		76 State income tax refund \$			
77 State income tax paid \$		78 State income tax refund \$			
79 State income tax paid \$		80 State income tax refund \$			
81 State income tax paid \$		82 State income tax refund \$			
83 State income tax paid \$		84 State income tax refund \$			
85 State income tax paid \$		86 State income tax refund \$			
87 State income tax paid \$		88 State income tax refund \$			
89 State income tax paid \$		90 State income tax refund \$			
91 State income tax paid \$		92 State income tax refund \$			
93 State income tax paid \$		94 State income tax refund \$			
95 State income tax paid \$		96 State income tax refund \$			
97 State income tax paid \$		98 State income tax refund \$			
99 State income tax paid \$		100 State income tax refund \$			



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Poetry's Lessons Car ...
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No Business Like e-Business

Keyen Farrell is among young entrepreneurs using Web to build early business success

By Brendan Sullivan '06

Photographer: Fred Field

When most economics majors go to sleep at night, they dream of running a successful business. Keyen Farrell '07 goes to bed every night having already done that—and, boy, does he sleep well. "It's the greatest feeling to know that you'll wake up richer in the morning than when you fall asleep every night," he said.

Farrell, 20, begins his day by checking into his online business that has put him "in the top one percent in income in the U.S.," he said. He started the company, Topaz Financial, as a senior in high school for a little over \$200 (he's invested more since) in software design costs, and since then he has enjoyed exponential returns.

In essence, Farrell operates a Web site that funnels customers to companies that sell products like insurance and credit cards online. Every month his advertisers pay him for his services. He, in turn, pays people who have signed up through his site, sending them money through PayPal, the online payment service.

Simple enough? Well, yes and no.

Farrell bids on popular Google search words, like "loan quote." Every time someone searches for one of Farrell's bid words, a link to his Web site appears, either on the Google page or on partner sites that post Google ads. Each time someone clicks his link, Farrell pays Google his bid amount, usually about 25 cents. With millions of searches flooding Google every day, he gets more than 1,000 visits to his Web site daily.

Once someone clicks on the link to his Web site, a new screen loads. It asks for the person's name and e-mail address and then directs the inquirer to a list of free offers from Farrell's

photo by: Fred Field



EXHIBIT "1E"

Jump to Another Issue:

go to...

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Search

contracted advertisers, from credit card offers to loan quotes.

And here's how Farrell distanced himself from similar businesses: when he started the company, he figured that users needed an incentive to sign up for the cards and quotes, so he literally pays customers to fill out applications.

Farrell offers users of his site anywhere from \$1 to \$5 to sign up for the offers. On average Farrell receives about \$14 for each offer completed. The \$14 is deposited in his bank account, and he forwards the promised \$1-\$5 to the user's account.

While he typically makes no more than \$15 per transaction, Farrell's pioneering cash incentive model lands him about 3,000 transactions per month, he said. While reluctant to reveal the Web site's actual earnings, Farrell explained that he "has enough to buy some time after college and a few things on the side." Not bad for a 20-year-old who admittedly only works on his business eight hours per week.

But is this all too good to be true? Not at all, said one industry expert. "It's definitely legit, and it's a huge part of Internet advertising with high profit margins," said Barry Parr, media analyst for Jupiter Research in New York. "The Internet levels the playing field for everybody, and you can get [a business] moving pretty quickly because the market is so huge."

With that global market, the income adds up. It's allowed him to start to save for retirement and to make a few acquisitions. "It was nice telling BMW's financing department that I would not be using their services when I bought a new X5," he admitted.

But in a time of extreme competition on the Internet, Farrell has had to save more than money.

During a recent visit to a popular software design Web site, he came across a startling request: someone had offered to purchase an exact copy of his Web site from an unscrupulous Web-designer. "They say imitation is the greatest form of flattery, but I was far from flattered," Farrell said.

One of the first principles he learned in microeconomics at Colby centered on barriers to entry to a market. Farrell later realized there were few barriers to enter his market. Very little start-up capital is needed and people were catching on to his tried-and-tested idea. So instead of fighting the competition, he's decided to adapt to it.

He plans to sell template copies of his Web site to other entrepreneurs for about \$1,000. If buzz on message boards and Web sites is any indication, there will be a healthy initial demand. Parr, the consultant, warns that Farrell's template alone does not guarantee success. "It's like all businesses. The people who succeed are extremely driven," he said.

But Farrell also plans to offer consulting services to his franchisees, ultimately phasing out his Web site completely and consulting full-time. "I can't do the same thing forever. I have to keep changing to keep up," he said.

While no one can say definitively whether Farrell's business-savvy ideas will translate to bigger and better things down the road, Parr has seen his kind before. "His business is not just a get-rich-quick scheme that anyone could do," he said. "He's the type of person, I would assume, that would excel at any type of business endeavor."

Farrell, meanwhile, is eyeing new markets. "[Economics] Professor Phil Brown's Jan Plan trip to China exposed me to opportunities outside of the U.S.," he said, before leaving to spend the spring semester in New Zealand.

That is not to say that Farrell is all business. In fact, he has used some of the fruit of his labors to help him relax. He recently bought a second sailboat for cruising on Long Island Sound near his Connecticut home, "something I never could've done before," he said.

Back on land, Farrell will continue to sleep well. "There's no business like e-business," he said.

Comments

On June 5, 2006 *jon gwynne from australia* wrote:

If the money [returned to the user of the website] was paid to a charity of the users choise, this would have better word of mouth advertising, I mean, who is going to worry about a few dollars? I know the groups that receive the money will be talking, even if it is only a few dollars.

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

SHOEMONEY MEDIA GROUP, INC.,)	Case No. 8:09cv131
)	
Plaintiff,)	
)	
vs.)	DECLARATION OF
)	AARON BAKER
KEYEN FARRELL and JOHN J. FARRELL,)	
)	
Defendants.)	

The undersigned, AARON BAKER, states and declares as follows:

1. I have personal knowledge of and am competent to testify about the facts stated herein and the documents attached hereto.
2. I submit this Declaration, at the request of Jeremy Schoemaker, in support of ShoeMoney Media Group's Motion to Extend Deadline for Responding to Defendants' Motion to Dismiss, and Motion for Leave to Conduct Jurisdictional Discovery.
3. I attended the United States Military Academy at West Point and I currently reside in Pennsylvania.
4. For more than six years, I have helped webmasters, marketers, and everyday people understand how search engines work, and market their businesses using my knowledge regarding same.
5. I am currently Executive Vice President of Global Sales for Atrinsic, Inc., which is one of the fastest growing digital advertising and entertainment networks in the United States. Prior to working for Atrinsic, I worked at Pepperjam Search, one of the

premier search engine marketing companies that conducts a variety of business including management of pay-per click (PPC) campaigns.

6. PPC is an internet advertising model used on search engines where advertisers pay their host only when their advertisement is clicked on. Advertisers are generally charged a fixed price per click based upon the amount they bid for the keywords that caused their advertisements to appear.

7. I have been engaged in PPC advertising since approximately 2003. During that time, I have regularly advised companies and clients about how to use PPC search engines such as Google AdWords. I have developed an intimate knowledge regarding PPC models including Google AdWords.

8. Google AdWords is a PPC model. I am very familiar with the Google AdWords program and the manner in which it operates. I am familiar with Google's Terms of Service which apply to advertisers who use Google's AdWords program. Google prohibits its AdWords advertisers from using a third party's trademarked terms in the text of their advertisements.

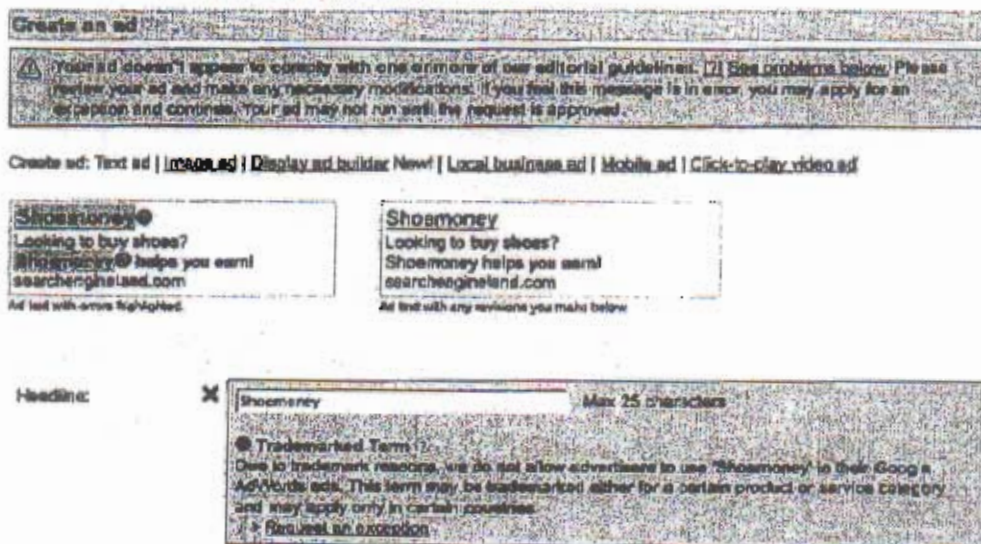
9. Jeremy Schoemaker and his company, ShoeMoney Media Group, are extremely well-known in the online marketing industry because of their past success, their strong presence on the world wide web, and Schoemaker's frequent columns, blog entries, and speeches on various topics regarding internet marketing and search engine optimization.

10. I am aware that ShoeMoney Media Group has registered the term "Shoemoney" as its trademark. Pursuant to Google's policy, ShoeMoney Media Group is the only person who may use the term "Shoemoney" in the text of advertisements

placed through the Google AdWords program. If unauthorized persons attempt to use "Shoemoney" in the text of their ads, Google will warn those persons that their proposed advertisements are contrary to Google's policy because the proposed ads contain a trademarked term, and Google will not permit the trademarked term to appear in the advertisement unless an exception is granted.

11. I have reviewed the Affidavits of Keyen Farrell and John Farrell submitted in this case. Based upon those Affidavits, it is my understanding that the Farrells claim they did not know the term "Shoemoney" was a trademarked term when they created their ads for www.myincentivewebsite.com in January, 2009.

12. Based upon my extensive experience with the Google AdWords program, it is my opinion that the Farrells would have been warned by Google that "Shoemoney" is a trademarked term when they first created the advertisements through the Google AdWords program and chose to use "Shoemoney" in the text of their ads. Below is a sample of the type of warning that Google presents to an advertiser that attempts to use trademarked terms such as "Shoemoney" in the text of their ads:



The Farrells do not state in their Affidavits whether they received a trademark warning when they created their ads using the "Shoemoney" trademark.

13. The Farrells state in their Affidavits that they were unfamiliar with ShoeMoney Media Group and its "Shoemoney" trademark when they created their ads using the "Shoemoney" term. I have reviewed the screen shots of the Farrells' Google AdWords account, which I understand Keyen Farrell provided to ShoeMoney Media Group's attorneys prior to the commencement of this lawsuit. A true and correct copy of the screen shots that I reviewed are attached hereto as Exhibit "A." The screen shots provided by Keyen Farrell show that the Farrells' AdWords account included four specific ad groups that were manually titled "Tier 2_Shoe money." Each of those four ad groups contained six terms related to the Shoemoney brand: "Shoemoney," shoemoney.com, wwwshoemoney, www.shoemoney.com, shoemoneycom, and www.shoemoney. For the Farrells' account to be set up in this manner, the Farrells would have had to make a conscious decision to have the Shoemoney-related terms appear in the text of their advertisements, and someone would have had to manually set up the "Shoemoney" ad groups. There is no automated system that could have created the specific ad groups for the "Shoemoney" terms.

14. The screen shots provided by the Farrells show that they manually set up those four ad groups for the specific purpose of targeting their advertisements at people searching the internet for "Shoemoney," shoemoney.com, wwwshoemoney, www.shoemoney.com, shoemoneycom, and www.shoemoney. All of the keywords in these four ad groups contain the "Shoemoney" trademark. In my opinion, these screen

shots conclusively demonstrate that the Farrells were specifically targeting customers who were searching the internet for information regarding the Plaintiff or its trademark.

15. It is illogical for someone to create an ad group, such as the "Tier 2_Shoe Money" ad groups created in the Farrells' account, if the person is unfamiliar with the meaning or identity of "Shoemoney." The creation of the specific "Shoemoney" ad groups strongly suggests that the Farrells were familiar with "Shoemoney" and specifically sought to have their advertisements appear on the Google search results page when people searched for "Shoemoney" or other variations containing the "Shoemoney" trademark.

16. Because AdWords advertisers pay Google a fixed amount each time someone clicks on their advertisements, advertisers have a strong incentive to only bid on keywords that the advertisers have researched and analyzed regarding potential profitability. To that end, advertisers usually choose to bid on keywords that are closely related to the product or service they are trying to sell, so that when the advertisement is displayed, it is being displayed to consumers who are already interested in the type or kind of product or service the advertiser is marketing. In other words, it makes sense that the Farrells would select the term "Shoemoney" (which is widely known for successful money-making ventures on the internet) to market their www.myincentivewebsite.com web site, which also involves an internet money-making system. Moreover, a minimal amount of research regarding Shoemoney would direct persons to www.shoemoney.com and www.shoemoneymedia.com, both of which contain prominent notices that ShoeMoney Media Group and its founder, Jeremy Schoemaker, are located in Nebraska.

17. It is my opinion, to a reasonable degree of certainty, that the person(s) who created the AdWords advertisements for www.myincentivewebsite.com were familiar with ShoeMoney Media Group or its "Shoemoney" trademark and specifically sought to market the www.myincentivewebsite.com web site to persons who were searching for web sites related to ShoeMoney Media Group, the "Shoemoney" trademark, or one of the ShoeMoney Media Group web sites.

18. All opinions offered herein are to a reasonable degree of certainty within the fields of world wide web marketing and search engine analysis.

19. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 11 day of May, 2009.



Aaron Baker

W509515.02



Campaign Management | **Reports** | **Analytics** | **My Account**
 Account Summary | Campaign Summary | Tools | Conversion Tracking | Website Optimizer
 Campaign Summary > US_Core_Broad > Tier2_Shoe Money

Search my campaigns
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Ad Group: Tier2_Shoe Money

[Keyword Shoe Money]
 Get Serious. Copy My Success with a
 Turn-Key Site that Earned \$313,000.
 MyIncentiveWebsite.com

1 of 4 - 2/26/09

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Jan 30, 2009 to Apr 1, 2009

☒ All time
☐ Jan 30, 2009 - Apr 1, 2009

☐ Include deleted items

+ Add keywords: [Quick add](#) | [Keyword tool](#)

☒ **Keyword**

[Edit keywords](#) | [Diagnose keywords](#) | [Search this list](#)

< Show/Hide columns > 1 - 6 of 6 keywords.

Keyword	Status	Current Bid Max CPC	Clicks	Imps	CTR	Avg CPC	Cost	Avg Pos
www.shoemoney	<input checked="" type="checkbox"/> Active	\$0.13	0	0	-	-	-	-
shoemoney.com	<input checked="" type="checkbox"/> Active	\$0.13	0	0	-	-	-	-
www.shoemoney	<input checked="" type="checkbox"/> Active	\$0.13	0	6	0.00%	-	-	2.3
shoemoney.com	<input checked="" type="checkbox"/> Active Bid is below first page bid estimate of \$0.30	\$0.13	0	7	0.00%	-	-	3.0
www.shoemoney.com	<input checked="" type="checkbox"/> Active	\$0.13	1	21	4.75%	\$0.05	\$0.05	2.3
shoemoney	<input checked="" type="checkbox"/> Active	\$0.13	8	1,072	0.75%	\$0.09	\$0.75	2.0
Content network total <input type="button" value="3"/>	Off	Content Auto <input type="button" value="Edit"/>	0	0	-	-	-	n/a
Search Total	On	Default \$0.13 <input type="button" value="Edit"/>	9	1,106	0.81%	\$0.09	\$0.80	2.0
Total			9	1,106	0.81%	\$0.09	\$0.80	2.0
1 - 6 of 6 keywords.								

Reporting is not real-time. Clicks and impressions received in the last 3 hours may not be included here.

There is a 24 hour delay in conversion tracking reporting.

Lower CTRs for content ads do not adversely affect your campaign.

Time zone for all statistics in this account: (GMT-05:00) Eastern Time. [Learn more](#)



Campaign Management Reports Analytics My Account

Account Snapshot | Campaign Summary | Tools | Conversion Tracking | Website Optimizer

Campaign Summary > US - Core - Exact > Tier2_Shoe Money

Search my campaigns: Search

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Ad Group: Tier2_Shoe Money

Shoe Money

Get Serious. Copy My Success with a Turn-Key Site that Earned \$313,000.
MyIncentiveWebsite.com

1 of 4 - view all

Paused — Resume ad group | Delete ad group

Explore the tabs to view details and fine-tune your account. [Close]

Jan 30, 2009 to Apr 1, 2009 Change range

All time

Jan 30, 2009 to Apr 1, 2009 Go

☐ Include deleted terms

+ Add keywords: Quick add | Keyword tool

Pause Unpause Delete Edit keyword settings

☐ Keyword Status ▲ ?

<input type="checkbox"/>	[www.shoemoney.com]	Q	Active
<input type="checkbox"/>	[shoemoney.com]	Q	Active
<input type="checkbox"/>	[www.shoemoney]	Q	Active
<input type="checkbox"/>	[www.shoemoney.com]	Q	Active
<input type="checkbox"/>	[shoemoney.com]	Q	Active
<input type="checkbox"/>	[shoemoney]	Q	Active

Bid is below first page bid estimate of \$0.30

<input type="checkbox"/>	Content network total ?	Off
<input type="checkbox"/>	Search Total	On
<input type="checkbox"/>	Total	

Pause Unpause Delete Edit keyword settings

Edit keywords | Diagnose keywords New | Search this list

<Show/hide columns> Done

Summary Keywords Placements Ad Variations

In this ad group, your keywords trigger ads on search only. The content network is turned off in your campaign settings. [Learn more](#)

Current Bid	Max CPC	Clicks	Imp.	CTR	Avg. CPC	Cost	Avg. Pos.
\$0.13	\$0.13	0	1	0.00%	-	-	1.0
\$0.13	\$0.13	0	1	0.00%	-	-	1.0
\$0.13	\$0.13	0	2	0.00%	-	-	1.0
\$0.13	\$0.13	0	27	0.00%	-	-	1.8
\$0.13	\$0.13	0	51	0.00%	-	-	2.1
\$0.13	\$0.13	36	3,807	0.95%	\$0.06	\$2.19	2.0
Content: Auto ?	[Edit]	0	0	-	-	-	n/a
Default: \$0.13	[Edit]	36	3,889	0.93%	\$0.06	\$2.19	2.0
		36	3,889	0.93%	\$0.06	\$2.19	2.0
1 - 6 of 6 keywords.							

View all tabs at once

Reporting is not real-time. Clicks and Impressions received in the last 3 hours may not be included here. There is a 24 hour delay in conversion tracking reporting.

Lower CTRs for content ads do not adversely affect your campaign. ?

Time zone for all statistics in this account: (GMT-05:00) Eastern Time [Learn more](#)



Campaign Management Reports Analytics My Account

Account Snapshot | Campaign Summary | Tools | Conversion Tracking | Website Optimizer

Campaign Summary > Int Core_Broad > Tier2_Shoe Money

Search my campaigns

Search

Prev 32 of 1319 ad groups Next

Ad Group: Tier2_Shoe Money

{Keyword Shoe Money}

Been There, Tried That. Own the Site that Earned Me \$313K in 1 Year
MyIncentiveWebsite.com

1 of 4 - view all

Paused — Resume ad group | Delete ad group

Explore the tabs to view details and fine-tune your account. [Close]

Jan 30, 2009 to Apr 1, 2009 Change range

(e) All time

Jan 30, 2009 - Apr 1, 2009 Go

☐ Include deleted items

+ Add keywords. Quick add 1 keyword tool

Pause Unpause Delete Edit keyword settings

Keyword Status ▲ ②

☐ www.shoemoney.com Active

☐ shoemoney.com Active

☐ www.shoemoney.com Active

☐ shoemoney.com Active

Bid is below first page bid estimate of \$0.30

☐ www.shoemoney.com Active

☐ shoemoney.com Active

Content network total ② Off

Search Total On

Total

Pause Unpause Delete Edit keyword settings

Summary Keywords Placements ② Ad Variations

In this ad group, your keywords trigger ads on search only. The content network is turned off in your campaign settings. [Learn more](#)

Edit keywords | Diagnose keywords ^{new} | Search this list

< Show/hide columns > ② Done

Keyword	Status	Current Bid Max CPC	Clicks	Imps	CTR	Avg. CPC	Cost	Avg. Pos.
www.shoemoney.com	Active	\$0.13	0	0	-	-	-	-
shoemoney.com	Active	\$0.13	0	0	-	-	-	-
www.shoemoney.com	Active	\$0.13	0	3	0.00%	-	-	1.3
shoemoney.com	Active	\$0.13	0	10	0.00%	-	-	1.0
www.shoemoney.com	Active	\$0.13	1	32	3.13%	\$0.05	\$0.05	1.1
shoemoney.com	Active	\$0.13	11	1,131	0.97%	\$0.09	\$1.02	1.6
Content network total ②	Off	Content Auto ② [Edit]	0	0	-	-	-	n/a
Search Total	On	Default \$0.13 [Edit]	12	1,176	1.02%	\$0.09	\$1.07	1.5
Total			12	1,176	1.02%	\$0.09	\$1.07	1.5
1 - 6 of 6 keywords								

View all tabs at once

Reporting is not real-time. Clicks and impressions received in the last 3 hours may not be included here.

There is a 24 hour delay in conversion tracking reporting.

Lower CTRs for content ads do not adversely affect your campaign. ②

Time zone for all statistics in this account: (GMT-05:00) Eastern Time. [Learn more](#)



Campaign Management Reports Analytics My Account

Account Snapshot | Campaign Summary | Tools | Conversion Tracking | Website Optimizer

Campaign Summary > Int Core Exact > Tier2_Shoe Money

Search my campaigns

Search

(Prev) 12 of 1319 ad groups (Next)

Ad Group: Tier2_Shoe Money

{Keyword: Shoe Money}

Been There, Tried That. Own the Site that Earned Me \$313K in 1 Year
MyIncentiveWebsite.com

1 of 4 - view all

Paused — Resume ad group | Delete ad group

Explore the tabs to view details and fine-tune your account. [Close]

Jan 30, 2009 to Apr 1, 2009 Change range

All time

Jan 30, 2009 - Apr 1, 2009 Go

☐ Include deleted items

+ Add keywords. Quick add | Keyword tool

☐ Keyword

Edit keywords | Diagnose keywords ^{New!} | Search this list

< Show/Hide columns > Done

Summary Keywords Placements Ad Variations

In this ad group, your keywords trigger ads on search only. The content network is turned off in your campaign settings. [Learn more](#)

1 - 6 of 6 keywords.									
Keyword	Status	Current Bid Max CPC	Clicks	Impr.	CTR	Avg. CPC	Cost	Avg. Pos.	
[www.shoemoney]	<input type="button" value="Q"/> Active	\$0.13	0	0	-	-	-	-	
[www.shoemoney]	<input type="button" value="Q"/> Active	\$0.13	0	0	-	-	-	-	
[shoemoney.com]	<input type="button" value="Q"/> Active	\$0.13	0	1	0.00%	-	-	1.0	
[www.shoemoney.com]	<input type="button" value="Q"/> Active	\$0.13	3	52	5.77%	\$0.11	\$0.34	1.0	
[shoemoney.com]	<input type="button" value="Q"/> Active Bid is below first page bid estimate of \$0.30	\$0.13	1	352	0.28%	\$0.05	\$0.05	1.0	
[shoemoney]	<input type="button" value="Q"/> Active	\$0.13	41	2,576	1.53%	\$0.07	\$2.86	1.0	
Content network total	<input type="button" value="2"/> Off	Content: Auto <input type="button" value="2"/> [Edit]	0	0	-	-	-	n/a	
Search Total	On	Default: \$0.13 [Edit]	45	3,061	1.45%	\$0.07	\$3.25	1.0	
Total			45	3,061	1.45%	\$0.07	\$3.25	1.0	1 - 6 of 6 keywords.

View all tabs at once

Reporting is not real-time. Clicks and impressions received in the last 3 hours may not be included here.

There is a 24 hour delay in conversion tracking reporting.

Lower CTRs for content ads do not adversely affect your campaign.

Time zone for all statistics in this account: (GMT-05:00) Eastern Time [Learn more](#)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

SHOEMONEY MEDIA GROUP, INC.,)	Case No. 8:09cv131
)	
Plaintiff,)	
)	
vs.)	DECLARATION OF
)	PATRICK S. COOPER
KEYEN FARRELL and JOHN J. FARRELL,)	
)	
Defendants.)	

The undersigned, PATRICK S. COOPER, states and declares as follows:

1. I am one of the attorneys for the Plaintiff, ShoeMoney Media Group, Inc., in the above-captioned matter. I have personal knowledge of, and am competent to testify about, the facts stated herein and the documents attached hereto.

2. I submit this Declaration in support of ShoeMoney Media Group's Motion to Extend Deadline for Responding to Defendants' Motion to Dismiss, and Motion for Leave to Conduct Jurisdictional Discovery.

3. On March 31, 2009, I sent a demand letter to Keyen Farrell regarding his alleged infringement of my client's "Shoemoney" trademark. On April 1, 2009, Mr. Farrell responded to my letter via e-mail. A true and correct copy of Keyen Farrell's response, including the documents attached to his response, are attached hereto as Exhibit "A."

4. I declare under penalty of perjury that the foregoing is true and correct.

Dated this 11th day of May, 2009.


Patrick S. Cooper

W509567.01

COOPER, PATRICK

From: Keyen Farrell [keyen.farrell@gmail.com]
Sent: Wednesday, April 01, 2009 5:35 PM
To: COOPER, PATRICK
Cc: MEYERSON, TROY
Subject: Re: Shoemoney Trademark --- Cease and Desist and Demand Letter

Patrick,

The keywords were uploaded on Jan 30, 2009 and accrued clicks in 4 ad groups. I've attached 4 screenshots from AdWords detailing each of these ad groups. I have also attached an Analytics report that shows these keywords drove no revenue whatsoever.

The keywords accrued a total of 102 clicks at a cost of \$7.31. Below I've included stats for each ad group:

US geo-targeted broad match: 9 clicks = \$.80
US geo-targeted exact match: 36 clicks = \$2.19
Internationally geo-targeted broad match: 12 clicks = \$1.07
Internationally geo-targeted exact match: 45 clicks = \$3.25

As I wrote yesterday, our ads are no longer running on these keywords. We have fully complied with your request and provided a full and truthful accounting. If we do not receive receipt of this email by EOD tomorrow, 3/2, we will consider this issue resolved.

On Tue, Mar 31, 2009 at 11:49 AM, COOPER, PATRICK <PCOOPER@fraserstryker.com> wrote:
Mr. Farrell -

Please see attached letter.

Patrick S. Cooper
Fraser Stryker PC LLO
500 Energy Plaza
409 South 17th Street
Omaha, NE 68102
Direct Dial 402.978.5376
Fax 402.341.8290
pcooper@fraserstryker.com

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Circular 230 Disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any matters addressed herein.



Campaign Management | Reports | Analytics | My Account

Account Snapshot | Campaign Summary | Tools | Conversion Tracking | Website Optimizer

Campaign Summary > US_Core_Broad > Tier2_Shoe Money

Search my campaigns

Search

< Prev 28 of 1319 ad groups Next >

Ad Group: Tier2_Shoe Money

KeyWord: Shoe Money!

Get Serious. Copy My Success with a Turn-Key Site that Earned \$313,000. MyIncentiveWebsite.com

1 of 4 - View all

Paused — Resume ad group | Delete ad group

Explore the tabs to view details and fine-tune your account. [Close]

Jan 30, 2009 to Apr 1, 2009 ▼ Change range

Ⓢ All time

Jan 30, 2009 - Apr 1, 2009 [Go]

☐ Include deleted items

+ Add keywords: Quick add | Keyword tool

[Pause] [Unpause] [Delete] [Edit Keyword Settings]

☐ Keyword ☐ Status ▲ ?

<input type="checkbox"/> www.shoemoney	<input type="checkbox"/> Active
<input type="checkbox"/> shoemoney.com	<input type="checkbox"/> Active
<input type="checkbox"/> www.shoemoney	<input type="checkbox"/> Active
<input type="checkbox"/> shoemoney.com	<input type="checkbox"/> Active
Bid is below first page bid estimate of \$0.30	
<input type="checkbox"/> www.shoemoney.com	<input type="checkbox"/> Active
<input type="checkbox"/> shoemoney	<input type="checkbox"/> Active

Content network total ?

Search Total

Total

[Pause] [Unpause] [Delete] [Edit Keyword Settings]

Edit keywords | Diagnose keywords | Search this list

<Show/hide columns> Done

1 - 6 of 6 keywords.

Current Bid Max CPC	Clicks	Imp.	CTR	Avg. CPC	Cost	Avg. Pos.
\$0.13	0	0	-	-	-	-
\$0.13	0	0	-	-	-	-
\$0.13	0	6	0.00%	-	-	2.3
\$0.13	0	7	0.00%	-	-	3.0
\$0.13	1	21	4.76%	\$0.05	\$0.05	2.3
\$0.13	8	1,072	0.75%	\$0.09	\$0.75	2.0
Content Auto ? [Edit]	0	0	-	-	-	n/a
Default \$0.13 [Edit]	9	1,106	0.81%	\$0.09	\$0.80	2.0
	9	1,106	0.81%	\$0.09	\$0.80	2.0
1 - 6 of 6 keywords.						

View all tabs at once

Reporting is not real-time. Clicks and Impressions received in the last 3 hours may not be included here. There is a 24 hour delay in conversion tracking reporting.

Lower CTRs for content ads do not adversely affect your campaign. ?

Time zone for all statistics in this account: (GMT-05:00) Eastern Time, Learn more.



Campaign Management | Reports | Analytics | My Account

Account Snapshot | Campaign Summary | Tools | Conversion Tracking | Website Optimizer | Campaign Summary > Int. Core Broad > Tier2_Shoe Money

Search my campaigns

Search

< Prev 32 of 1319 ad groups Next >

Ad Group: Tier2_Shoe Money

KeyWord Shoe Money!

Been There, Tried That. Own the Site that Earned Me \$313K in 1 Year
MyIncentiveWebsite.com

1 of 4 - View all

Paused — Resume ad group | Delete ad group

Explore the tabs to view details and fine-tune your account. [Close]

Jan 30, 2009 to Apr 1, 2009 Change range

All time

Jan 30, 2009 - Apr 1, 2009 Go

☐ Include deleted items

+ Add keywords: Quick add | Keyword tool

☐ Keyword

Edit keywords | Diagnose keywords New! | Search this list

< Show/Hide columns > Done

Summary Keywords Placements Ad Variations
In this ad group, your keywords trigger ads on search only. The content network is turned off in your campaign settings. [Learn more](#)

Keyword	Status	Current Bid Max CPC	Clicks	Impr.	CTR	Avg. CPC	Cost	Avg. Pos.
<input type="checkbox"/> www.shoemoney	Active	\$0.13	0	0	-	-	-	-
<input type="checkbox"/> shoemoney.com	Active	\$0.13	0	0	-	-	-	-
<input type="checkbox"/> www.shoemoney	Active	\$0.13	0	3	0.00%	-	-	1.3
<input type="checkbox"/> shoemoney.com	Active	\$0.13	0	10	0.00%	-	-	1.0
<input type="checkbox"/> www.shoemoney.com	Active	\$0.13	1	32	3.13%	\$0.05	\$0.05	1.1
<input type="checkbox"/> shoemoney	Active	\$0.13	11	1,131	0.97%	\$0.08	\$1.02	1.6
Content network total	Off	Content Auto	0	0	-	-	-	n/a
Search Total	On	Default \$0.13	12	1,176	1.02%	\$0.09	\$1.07	1.5
Total			12	1,176	1.02%	\$0.09	\$1.07	1.5

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Campaign Management | Reports | Analytics | My Account

Account Snapshot | Campaign Summary | Tools | Conversion Tracking | Website Optimizer

Campaign Summary > Int Core Exact > Tier2 Shoe Money

Search my campaigns

Search

< Prev 12 of 1319 ad groups Next >

Ad Group: Tier2_Shoe Money

KeyWord Shoe Money:
Been There, Tried That. Own the
Site that Earned Me \$313K in 1 Year
MyIncentiveWebsite.com

1 of 4 - View all

Paused — Resume ad group | Delete ad group

Explore the tabs to view details and
fine-tune your account. [Close]

Jan 30, 2009 to Apr 1, 2009 Change range

All time

Jan 30, 2009 - Apr 1, 2009 Go

☐ Include deleted items

+ Add keywords: Quick add | Keyword tool

☐ Keyword

Edit keywords | Diagnose keywords **New!** | Search this list

< Show/hide columns >

1 - 6 of 6 keywords.

Keyword	Status	Current Bid	Max CPC	Clicks	Imp.	CTR	Avg. CPC	Cost	Avg. Pos.
<input type="checkbox"/> [www.shoemoney]	Active	\$0.13		0	0	-	-	-	-
<input type="checkbox"/> [www.shoemoney]	Active	\$0.13		0	0	-	-	-	-
<input type="checkbox"/> [shoemoney.com]	Active	\$0.13		0	1	0.00%	-	-	1.0
<input type="checkbox"/> [www.shoemoney.com]	Active	\$0.13		3	52	5.77%	\$0.11	\$0.34	1.0
<input type="checkbox"/> [shoemoney.com]	Active	\$0.13		1	352	0.28%	\$0.05	\$0.05	1.0
<input type="checkbox"/> [shoemoney]	Active	\$0.13		41	2,676	1.53%	\$0.07	\$2.66	1.0
Content network total <input type="button" value="Edit"/>	Off	Content Auto <input type="button" value="Edit"/>		0	0	-	-	-	n/a
Search Total	On	Default \$0.13 <input type="button" value="Edit"/>		45	3,081	1.46%	\$0.07	\$3.25	1.0
Total				45	3,081	1.46%	\$0.07	\$3.25	1.0

1 - 6 of 6 keywords.

Reporting is not real-time. Clicks and impressions received in the last 3 hours may not be included here.
There is a 24 hour delay in conversion tracking reporting.

Lower CTRs for content ads do not adversely affect your campaign.

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[Traffic Sources](#)
[Overview](#)
[Direct Traffic](#)
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[Search Engines](#)
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[AdWords](#)
[Campaigns](#)
[Ad Versions](#)
[Content](#)
[Goals](#)
[Ecommerce](#)
[Custom Reporting](#)
[Settings](#)
[Advanced Segments](#)
[Email](#)
[Help Resources](#)
[About this Report](#)
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[Common Questions](#)
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Campaigns

[Data Advanced Segments](#)
[All Visits](#)

Jan 1, 2009 - Mar 31, 2009

[Visits](#)
[Graph by:](#)


Campaign traffic sent 90 visits via 3 keywords containing "shoemoney"

[Site Usage](#)
[Goal Conversion](#)
[Ecommerce](#)
[Views](#)
[Visits](#)
[90](#)
[% of Site Total: 0.12%](#)
[Goal1: Order Page View](#)
[13.33%](#)
[Site Avg: 8.44% \(58.07%\)](#)
[Goal2: Package Sale](#)
[0.00%](#)
[Site Avg: 0.76% \(-100.00%\)](#)
[Goal Conversion Rate](#)
[13.33%](#)
[Site Avg: 9.19% \(45.02%\)](#)
[Per Visit Goal Value](#)
[\\$0.00](#)
[Site Avg: \\$0.09 \(-100.00%\)](#)
[Goal Conversion Rate](#)
[14.29%](#)
[Site Avg: 0.00%](#)
[Per Visit Goal Value](#)
[\\$0.00](#)
[Site Avg: \\$0.00](#)
[Goal Conversion Rate](#)
[14.29%](#)
[Site Avg: 0.00%](#)
[Per Visit Goal Value](#)
[\\$0.00](#)
[Site Avg: \\$0.00](#)
[Visits](#)
[84](#)
[Order Page View](#)
[14.29%](#)
[Package Sale](#)
[0.00%](#)
[Per Visit Goal Value](#)
[\\$0.00](#)
[Site Avg: \\$0.00](#)
[Goal Conversion Rate](#)
[14.29%](#)
[Site Avg: 0.00%](#)
[Per Visit Goal Value](#)
[\\$0.00](#)
[Site Avg: \\$0.00](#)
[Goal Conversion Rate](#)
[14.29%](#)
[Site Avg: 0.00%](#)
[Per Visit Goal Value](#)
[\\$0.00](#)
[Site Avg: \\$0.00](#)
[Goal Conversion Rate](#)
[14.29%](#)
[Site Avg: 0.00%](#)
[Per Visit Goal Value](#)
[\\$0.00](#)
[Site Avg: \\$0.00](#)
[Find Keyword: containing](#)
[shoemoney](#)
[Go](#)
[Go](#)
[Go to: 1](#)
[Show rows: 10](#)
[1 - 3 of 3](#)
[1 - 3 of 3](#)
[1 - 3 of 3](#)
[1 - 3 of 3](#)